## **EXHIBIT A**

Name	Date	Description	Rate	Hours	Amount
		Draft chronology of discovery requests, meet and confers and other			
	44/40/0040	discovery-related communications with opposing counsel for purpose of	¢225.00		4077.50
Wesley Lewis	11/12/2019	drafting Motion to Compel.	\$325.00	2.7	\$877.50
Laura Drathar	11/12/2010	Outline chronology of Plaintiff's promises to produce documents to	\$475.00	0.4	¢100.00
Laura Prather	11/12/2019	support Motion to Compel.  Review chronology of discovery and failed attempts to obtain documents	\$475.00	0.4	\$190.00
Laura Prather	11/12/2019	from Plaintiff to support Motion to Compel.	\$475.00	0.2	\$95.00
Ludia i iudiici	11,12,2015	Confer with co-counsel regarding Plaintiff's additional deficient discovery	ψ473.00	0.2	<b>\$33.00</b>
		responses and incorporation of same into letter to opposing counsel and			
Laura Prather	11/19/2019	Motion to Compel.	\$475.00	0.2	\$95.00
	, ., .	Telephonic conference with I. Bucon to discuss Motion to Compel meet-			,
Wesley Lewis	11/26/2019	and-confer requirements.	\$325.00	0.2	\$65.00
		Telephonic conference with S. Sivinski to discuss meet-and-confer			
Wesley Lewis	11/26/2019	requirements for motions to compel and pending discovery issues.	\$325.00	0.5	\$162.50
		Develop strategy for meeting and conferring regarding motion to compel			
Stephanie Sivinski	11/26/2019	documents from Butowsky.	\$325.00	0.4	\$130.00
		Prepare for meet and confer with opposing counsel by reviewing discovery			
Laura Prather	12/2/2019	responses and deficiencies in same.	\$475.00	0.8	\$380.00
		Review and respond to correspondence from opposing counsel regarding			4
Laura Prather	12/3/2019	meet and confer.	\$475.00	0.1	\$47.50
La ca Baatha a	42/4/2040	Meet and confer with S. Biss and D. Bodney regarding discovery	Ć47F 00	4.5	6742.50
Laura Prather	12/4/2019	deficiencies.	\$475.00	1.5	\$712.50
Laura Prather	12/6/2019	Review meet and confer requirements for Judge Cravens for Motion to Compel and RTP Motion.	\$475.00	0.2	\$95.00
Laura Fractier	12/0/2019	Review correspondence with client regarding discovery dispute with	у <del>ч</del> 73.00	0.2	Ş93.00
Laura Prather	12/6/2019	Plaintiff and outcome of meet and confer.	\$475.00	0.4	\$190.00
Stephanie Sivinski	12/6/2019	Review meet and confer requirements in the local rules.	\$325.00	0.1	\$32.50
	, .,	Review correspondence to and from S. Biss regarding additional	,		,
Laura Prather	12/9/2019	deficiencies in discovery.	\$475.00	0.3	\$142.50
		Review and respond to correspondence from opposing counsel regarding			
Laura Prather	12/12/2019	discovery disputes and outstanding subpoenas.	\$475.00	0.3	\$142.50
		Meet and confer with D. Bodney and S. Biss concerning deficiencies in			
Laura Prather	12/13/2019	Plaintiff's discovery responses and document production.	\$475.00	0.8	\$380.00
		Review and respond to correspondence from opposing counsel regarding			
Laura Prather	12/16/2019	discovery disputes.	\$475.00	0.1	\$47.50
		Confer with co-counsel regarding materials sent by Plaintiff and approach			
Laura Prather	12/17/2019	to discovery dispute.	\$475.00	0.5	\$237.50
	10/17/0010	Review and respond to correspondence from opposing counsel regarding	ć 47F 00		4440.50
Laura Prather	12/17/2019	discovery issues.	\$475.00	0.3	\$142.50
Wooley Lewis	12/19/2010	Draft letter to opposing counsel outlining deficiencies in document production.	¢22E 00	2.5	Ć012 FO
Wesley Lewis Laura Prather	12/18/2019 12/18/2019	Draft correspondence to client with draft Motion to Compel.	\$325.00 \$475.00	2.5 0.1	\$812.50 \$47.50
Laura Frauliei	12/16/2019	Review strategy and issues regarding Motion to Compel and related	\$475.00	0.1	347.30
David Harper	12/19/2019	production issues by Plaintiff's counsel	\$475.00	0.7	\$332.50
David Harper	12,13,2013	Draft summary of necessary revisions to Motion to Compel for co-counsel	ψ 1,7 510 C	0.7	<b>4332.30</b>
Laura Prather	12/19/2019	as a result of deficiencies in Plaintiff's discovery responses.	\$475.00	0.4	\$190.00
	, ., .	Draft correspondence to opposing counsel regarding deficiencies in			,
Laura Prather	12/19/2019	production and the potential for a forensic examination.	\$475.00	0.4	\$190.00
		Draft correspondence to co-counsel outlining necessary revisions to			
Laura Prather	12/19/2019	Motion to Compel and Rule 11 Motion.	\$475.00	0.4	\$190.00
David Harper	12/20/2019	Review issues regarding possible Motion to Compel and spoliation issues.	\$475.00	0.5	\$237.50
		Review documents produced by Fox News, Wheeler and compare to			
		Butowsky production to assess deficiencies in Butowsky document			
Wesley Lewis	12/23/2019	production for inclusion in Motion to Compel.	\$325.00	4.8	\$1,560.00
		Draft summary of Rich Motion to Compel and useful information for our			
Laura Prather	12/30/2019	Motion to Compel for client.	\$475.00	0.2	\$95.00
Laura Prather	12/31/2019	Confer with co-counsel regarding Motion to Compel.	\$475.00	0.1	\$47.50
Stephanie Sivinski	1/3/2020	Revise draft Motion to Compel Butowsky.	\$325.00	0.8	\$260.00
Stephanie Sivinski	1/4/2020	Revise draft Motion to Compel documents from Plaintiff.	\$325.00	2.5	\$812.50
Mark L.	4 /7 /2022	Revise draft of Motion to Compel E. Butowsky to address comments from	6225.00		Acco ==
Wesley Lewis	1/7/2020	L. Prather and client.	\$325.00	2.1	\$682.50
Wesley Lewis	1/7/2020	Conduct research to compile factual support in record for Motion to Compel.	\$325.00	3.8	\$1,235.00
vvesicy Lewis	1/ // 2020	Compan	<del>7</del> 323.00	3.0	J1,233.00

Name	Date	Description	Rate	Hours	Amount
		Outline additional issues for inclusion in Motion to Compel against			
Laura Prather	1/7/2020	Butowsky.	\$475.00	0.2	\$95.00
Laura Prather	1/8/2020	Review and revise Motion to Compel Butowsky.	\$475.00	2.8	\$1,330.00
Laura Prather	1/8/2020	Outline Declaration of W. Lewis in support of Motion to Compel.	\$475.00	0.4	\$1,330.00
Laura Prather		Review client comments on Motion to Compel.	\$475.00	0.4	\$95.00
Laura Frattiei	1/9/2020	Draft and revise Declaration of W. Lewis in support of Motion to Compel E.	3473.00	0.2	,55J.UC
Modey Louis	1/10/2020	Butowsky.	\$325.00	4.5	¢1 462 E0
Wesley Lewis	1/10/2020	•	\$323.00	4.5	\$1,462.50
Made. Leuis	1/10/2020	Revise Motion to Compel E. Butowsky by incorporating edits and revisions	¢225.00	4.1	¢4 222 F/
Wesley Lewis	1/10/2020	from L. Prather, [REDACTED]and [REDACTED].	\$325.00	4.1	\$1,332.50
La ca Bartha a	4 /4 0 /2 02 0	Review and respond to correspondence with client concerning Motion to	ć 47E 00	0.6	¢205.00
Laura Prather	1/10/2020	Compel and Declaration in Support.	\$475.00	0.6	\$285.00
	. / /	Make substantial revisions to Motion to Compel and incorporate	4.75.00		44
Laura Prather	1/10/2020	additional documentary support as exhibits.	\$475.00	3.7	\$1,757.50
		Review correspondence and proposed revisions to Motion to Compel from			
Laura Prather	1/11/2020	D. Bodney.	\$475.00	0.6	\$285.00
		Draft correspondence to team regarding document production to be			
		made in conjunction with Motion to Compel and series of filings for the			
		upcoming week, including Motion to Compel Butowsky, Motion to Compel			
Laura Prather	1/11/2020	Sims, Motion to Compel Chapwood and Rule 11 Motion.	\$475.00	0.3	\$142.50
Laura Prather	1/12/2020	Review proposed revisions and comments to Motion to Compel.	\$475.00	0.6	\$285.0
		Conduct research regarding necessity of filing Motion to Compel E.			
		Butowsky under seal due to confidential nature of documents relied upon			
Wesley Lewis	1/13/2020	therein.	\$325.00	1.2	\$390.00
Wesley Lewis	1/13/2020	Revise and conduct citation check of Motion to Compel E. Butowsky.	\$325.00	6.7	\$2,177.50
Laura Prather	1/13/2020	Review revised Motion to Compel and Declaration of W. Lewis.	\$475.00	0.5	\$237.50
Stephanie Sivinski	1/13/2020	Analyze requirements for filing Motion to Compel under seal.	\$325.00	1.1	\$357.50
Stephanic Sivinski	1/13/2020	Confer with D. Bodney regarding confidentiality designation and impact	<b>JJ2J.00</b>	1.1	7557.50
Laura Prather	1/14/2020	on sealing v. redaction of Motion to Compel Butowsky.	\$475.00	0.2	¢142 F/
Laura Frauliei	1/14/2020		\$475.00	0.3	\$142.50
Lavina Duathau	1/15/2020	Outline issues that have arisen relevant to Reply to Response to Motion to	¢47E 00	0.2	ĆOE O
Laura Prather	1/15/2020	Compel.	\$475.00	0.2	\$95.00
Laura Prather	1/19/2020	Review redacted Motion to Compel.	\$475.00	1.0	\$475.00
		Review and revise draft unopposed motion and proposed order			
Laura Prather	1/27/2020	concerning Response and Reply to Motion to Compel.	\$475.00	0.2	\$95.00
		Review correspondence from S. Biss regarding Response to Motion to			
Laura Prather	1/27/2020	Compel.	\$475.00	0.1	\$47.50
		Telephone call with S. Biss regarding pending Motion to Compel, Rule 11			
Laura Prather	1/27/2020	Sanctions Motion, scheduling order and potential case resolution.	\$475.00	0.2	\$95.00
		Draft correspondence to [REDACTED] regarding recent filings of Motions			
Laura Prather	1/28/2020	to Compel and notice provided to opposing counsel of Rule 11 Motion.	\$475.00	0.3	\$142.50
	_,,	Review Plaintiff's Response to Motion to Compel (.6). Draft summary of	7		<b>,</b> - 1-101
Wesley Lewis	2/3/2020	Plaintiff's Response to Motion to Compel for client (.2).	\$325.00	0.8	\$260.00
Laura Prather	2/3/2020	Review Plaintiff's Response to Motion to Compel.	\$475.00	0.9	\$427.50
Laura Prather		·	\$475.00		\$237.5
	2/3/2020	Draft outline of Reply to Response to Motion to Compel.		0.5	
Laura Prather	2/4/2020	Outline Reply to Response to Motion to Compel.	\$475.00	0.2	\$95.0
Stephanie Sivinski	2/4/2020	Read and analyze Motion to Compel Response filed by Plaintiff.	\$325.00	0.4	\$130.0
	- /- /	Develop strategy for Reply Brief in Support of the Motion to Compel			
Stephanie Sivinski	2/5/2020	Documents and Interrogatory Responses from Plaintiff.	\$325.00	0.5	\$162.5
		Conduct legal research regarding objections on relevance grounds in			
Wesley Lewis	2/6/2020	response to a motion to compel documents.	\$325.00	2.0	\$650.0
		Conduct legal research regarding showing necessary to rebut entitlement			
		to documents or excuse failure to participate in discovery in response to a			
Wesley Lewis	2/6/2020	motion to compel documents.	\$325.00	1.5	\$487.5
Wesley Lewis	2/6/2020	Draft outline of Reply in Support of Motion to Compel E. Butowsky.	\$325.00	2.1	\$682.5
		Confer with client regarding Reply to Response to Motion to Compel and			
Laura Prather	2/6/2020	request for forensic examination of Plaintiff's computer.	\$475.00	0.3	\$142.5
	, -,	Revise and edit outline of Reply in Support of Defendants' Motion to			,
Wesley Lewis	2/10/2020	Compel Ed Butowsky.	\$325.00	1.8	\$585.0
VVCSICY LEVVIS	2, 10, 2020	Confer with counsel regarding draft Reply to Response to Motion to	7525.00	1.0	ال.دەدې
Laura Drathau	2/10/2020		¢47E 00	0.3	ĆOF O
Laura Prather	2/10/2020	Compel.	\$475.00	0.2	\$95.0
	0/46/2224	Review and revise draft outline for Reply to Response to Motion to	A		
Laura Prather	2/10/2020	Compel.	\$475.00	0.6	\$285.0
Wesley Lewis	2/11/2020	Draft Reply in Support of Defendants' Motion to Compel E. Butowsky.	\$325.00	4.5	\$1,462.5
		Continue drafting Reply in Support of Defendants' Motion to Compel E.			
Wesley Lewis	2/12/2020	Butowsky.	\$325.00	3.8	\$1,235.00

Name	Date	Description	Rate	Hours	Amount
		Review correspondence as potential exhibits to Reply to Response to			
Laura Prather	2/12/2020	Motion to Compel.	\$475.00	0.3	\$142.50
Laura Prather	2/12/2020	Review and revise draft Reply to Response to Motion to Compel.	\$475.00	1.5	\$712.50
Laura Fractiei	2/12/2020	Revise Reply in Support of Motion to Compel Butowsky and circulate	Ş473.00	1.5	\$/12.50
Wesley Lewis	2/13/2020	updated draft to team.	\$325.00	2.0	\$650.0
Manlau Lauda	2/12/2020	Draft Declaration of L. Prather is support of Reply in Support of	Ć22F 00	1.0	ĆEOE O
Wesley Lewis	2/13/2020	Defendants' Motion to Compel E. Butowsky.  Compile proposed Exhibits to Declaration of Laura Prather in Support of	\$325.00	1.8	\$585.0
Wesley Lewis	2/13/2020	Reply in Support of Defendants' Motion to Compel E. Butowsky.	\$325.00	1.3	\$422.5
		Telephonic conference with team regarding pending Motions to Compel			
Wesley Lewis	2/13/2020	and for Sanctions.	\$325.00	0.9	\$292.5
		Telephonic conference with I. Bucon regarding status of Butowsky			
		document production and number of documents produced by Plaintiff for purposes of inclusion in Reply in Support of Defendants' Motion to			
Wesley Lewis	2/13/2020	Compel Butowsky.	\$325.00	0.3	\$97.5
Laura Prather	2/13/2020	Review proposed exhibits to Reply to Response to Motion to Compel.	\$475.00	0.3	\$142.5
Laura Prather	2/13/2020	Review and revise new draft Reply to Response to Motion to Compel.  Revise draft Prather Declaration in support of Reply in Support of	\$475.00	1.0	\$475.0
Wesley Lewis	2/14/2020	Defendants' Motion to Compel.	\$325.00	0.5	\$162.5
•	2/14/2020	•			
Laura Prather	2/14/2020	Review revised draft of Reply to Response to Motion to Compel.  Confer regarding Declaration in Support of Reply to Response to Motion	\$475.00	0.8	\$380.0
Laura Prather	2/14/2020	to Compel and exhibits attached thereto.	\$475.00	0.3	\$142.5
Laura Pratner	2/14/2020	Review revised Declaration, Reply to Response to Motion to Compel and	\$475.00	0.3	\$142.5
Laura Prather	2/15/2020	exhibits.	\$475.00	0.7	\$332.5
Laura Fratrici	2/13/2020	Review revised Replyto Response to Motion to Compel and draft	Ç475.00	0.7	7552.5
Laura Prather	2/16/2020	Declaration.	\$475.00	0.7	\$332.5
		Draft correspondence to team regarding Defendant's Notice of Correction			
Wesley Lewis	2/17/2020	in A. Rich litigation and impact on Defendants' Motion to Compel Plaintiff.	\$325.00	0.3	\$97.5
		Review and revise draft Declaration in Support of Reply to Response to			
Laura Prather	2/17/2020	Motion to Compel.	\$475.00	1.8	\$855.0
		Review and revise draft Reply to Response to Motion to Compel in light of			
Laura Prather	2/17/2020	recent representations by E. Quainton concerning document production.	\$475.00	0.9	\$427.5
zadia i idire.	2, 17, 2020	Conduct final review of Reply in Support of Defendants' Motion to Compel	+	0.5	ψ
		E. Butowsky and corresponding exhibits to ensure document is ready for			
Wesley Lewis	2/18/2020	filing.	\$325.00	1.9	\$617.5
Laura Prather	2/18/2020	Revise and finalize Reply to Response to Motion to Compel.	\$475.00	0.2	\$95.0
	_,,	Review and finalize Declaration in Support of Reply to Response to Motion	,		,
Laura Prather	2/18/2020	to Compel.	\$475.00	0.7	\$332.5
		Review draft outlines for supplemental authority in support of Motion to			
David Harper	4/8/2020	Compel and other draft pleadings.	\$475.00	0.3	\$142.5
		Draft outline for draft Notice of Supplemental Authority regarding Motion			
Stephanie Sivinski	4/8/2020	to Compel.	\$475.00	0.4	\$190.0
		Review AT&T record analysis and trends that can be drawn from analysis to support Notice of Supplemental Evidence in support of Motion to			
Laura Prather	4/24/2020	Compel.	\$475.00	0.3	\$142.5
Laura Pratner	4/24/2020	Identify potential sources of citation for Notice of Supplemental Evidence	\$475.00	0.5	\$142.5
Stephanie Sivinski	4/25/2020	in support of Motion to Compel.	\$475.00	0.4	\$190.0
Stephanie Siviliski	4/23/2020	Begin drafting Notice of Supplemental Evidence in support of Motion to	<del>74</del> 73.00	0.4	Ş190.0
Stephanie Sivinski	4/26/2020	Compel.	\$475.00	0.6	\$285.0
,	, ,, ,	Identify examples of documents produced in A. Rich's case but not in NPR			
		for inclusion in the Notice of Supplemental Evidence in Support of the			
Stephanie Sivinski	4/27/2020	Motion to Compel.	\$475.00	1.0	\$475.0
		Review documents produced by Butowsky to compare the number of			
		Zimmerman text messages produced with the number disclosed in the			
		AT&T call records for use in the Notice of Supplemental Evidence in			
Stephanie Sivinski	4/27/2020	support of the Motion to Compel.	\$475.00	2.1	\$997.5
<b>.</b>		Continue drafting Notice of Supplemental Evidence in Support of Motion			
Stephanie Sivinski	4/27/2020	to Compel.	\$475.00	1.0	\$475.0
	. /05 /	Continue drafting Notice of Supplemental Evidence in Support of Motion	A 0-		
Stephanie Sivinski	4/28/2020	to Compel documents from Butowsky.	\$475.00	1.7	\$807.5
Stanbania Sivinglii	4/20/2020	Revise draft notice of supplemental evidence in support of Motion to	\$47E 00	2.6	¢1 710 0
Stephanie Sivinski	4/29/2020	Compel.	\$475.00	3.6	\$1,710.0

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	Name	Date	Description	Rate	Hours	Amount
I						
			Review and revise draft Notice of Supplemental Authority as to Motion to			
	David Harper	4/30/2020	Compel.	\$475.00	0.4	\$190.00
				<u> </u>	109.2	\$42,210.00

Name	Date	<u>Description</u>	Rate	Hours	Amount
Bucon,I.O.	11/24/2019	Research Fifth Circuit case law re: motion to compel discovery pursuant to Fed. R. Civ. P. 37.	\$395.00	09.0	\$237.00
Bucon,I.O.	11/25/2019	Review local rules re: discovery to prepare to draft motion to compel discovery from Plaintiff.	\$395.00	0.20	\$79.00
Bucon,I.O.	11/25/2019	Draft motion to compel discovery from Plaintiff pursuant to Fed. R. Civ. P. 37.	\$395.00	06.0	\$355.50
Bucon,I.O.	11/26/2019	Continue to draft motion to compel discovery from Plaintiff pursuant to Fed. R. Civ. P. 37.	\$395.00	1.20	\$474.00
Bucon,I.O.	11/27/2019	Review and evaluate local rules re: discovery disputes to inform strategy for motion to compel.	\$395.00	0.20	\$79.00
Bucon,I.O.	12/10/2019	Research and analysis of Fifth Circuit case law re: discovery objections, motion to compel and sanctions.	\$395.00	1.00	\$395.00
Bucon,I.O.	12/10/2019	Draft motion to compel discovery re: plaintiff's deficient discovery responses.	\$395.00	0.70	\$276.50
Bucon,I.O.	12/11/2019	Draft motion to compel discovery re: plaintiff's discovery deficiencies.	\$395.00	1.50	\$592.50
Bodney,D.	12/12/2019	Analysis of issues in motion to compel	\$485.00	0.20	\$97.00
Bucon,I.O.	12/12/2019	Research and analyze Fifth Circuit case law re: Rule 37 motions to compel discovery and sanctions.	\$395.00	1.80	\$711.00
Bucon,I.O.	12/12/2019	Draft motion to compel discovery from plaintiff.	\$395.00	2.00	\$790.00
Bodney, D.	12/13/2019	Draft memorandum for clients re: [redacted] motion to compel.	\$485.00	0.70	\$339.50
Bodney,D.	12/13/2019	Revise draft Motion to Compel Discovery.	\$485.00	08.0	\$388.00
Bodney,D.	12/13/2019	Electronic communications with defense team re: Motion to Compel.	\$485.00	0.10	\$48.50
Bucon,I.O.	12/17/2019	Draft, review and revise motion to compel discovery in light of plaintiff's initial document production.	\$395.00	3.00	\$1,185.00
Bucon,I.O.	12/30/2019	Review and revise motion to compel discovery [for: redacted].	\$395.00	2.90	\$1,145.50
Bucon, I.O.	12/31/2019	Review and analyze plaintiff's document production [for: redacted] motion to	\$395.00	2.50	\$987.50
		compel discovery.			
Bucon,I.O.	12/31/2019	Review and revise motion to compel discovery [re: redacted].	\$395.00	2.60	\$1,027.00
Bucon,I.O.	01/02/2020	Review and revise motion to compel plaintiff to comply with defendants' discovery requests.	\$395.00	1.00	\$395.00
Bodney,D.	01/09/2020	Revise motion to compel discovery.	\$485.00	2.00	\$970.00
Bodney,D.	01/09/2020	Teleconference with [client] re motion to compel.	\$485.00	0.50	\$242.50
Bucon,I.O.	01/09/2020	Review and evaluate revised motion to compel plaintiff's discovery responses.	\$395.00	0.50	\$197.50

Bodney, D. 01/10/2020 Revise motion to compel and W. Lewis and exhibits.  Bodney, D. 01/11/2020 Teleconference with [client] re motion bedoney, D. 01/11/2020 Revise draft Motion to Compel and Dec Bodney, D. 01/11/2020 Revise draft Motion to Compel and Dec Bodney, D. 01/13/2020 Review client's suggested edits to motic Bodney, D. 01/13/2020 Review client's suggested edits to motic Bodney, D. 01/13/2020 Review client's suggested edits to motic Bodney, D. 01/13/2020 Review and revise motion to compel dis Bucon, I.O. 01/13/2020 Review and accompanying exhibits unc Compel and accompanying declaration.  Bucon, I.O. 01/13/2020 Review and analyze plaintiff's documen compel of Bucon, I.O. 01/13/2020 Review and analyze plaintiff's documen compel of Display, D. 01/14/2020 Review order re duty to file redacted M Bodney, D. 01/14/2020 Review order re duty to file redacted M Exhibits.  Bucon, I.O. 01/14/2020 Review order re duty to file redacted M Exhibits.  Bucon, I.O. 01/14/2020 Review and analyze stipulated protective redactions for public motion to compel		)	Hours	Amount
01/10/2020 01/11/2020 01/11/2020 01/13/2020 01/13/2020 01/13/2020 01/13/2020 01/13/2020 01/13/2020 01/13/2020 01/13/2020 01/14/2020	Revise motion to compel and W. Lewis Declaration, including references to rules and exhibits.	\$485.00	3.00	\$1,455.00
01/11/2020 01/11/2020 01/13/2020 01/13/2020 01/13/2020 01/13/2020 01/13/2020 01/13/2020 01/13/2020 01/14/2020 01/14/2020	Teleconference with [client] re motion to compel [redacted].	\$485.00	0.10	\$48.50
01/11/2020 01/13/2020 01/13/2020 01/13/2020 01/13/2020 01/13/2020 01/13/2020 01/13/2020 01/14/2020 01/14/2020	Revise draft Motion to Compel and Declaration.	\$485.00	3.70	\$1,794.50
01/13/2020 01/13/2020 01/13/2020 01/13/2020 01/13/2020 01/13/2020 01/14/2020 01/14/2020	Electronic communication with client re draft Motion to Compel and Declaration in support thereof.	\$485.00	0.20	\$97.00
01/13/2020 01/13/2020 01/13/2020 01/13/2020 01/13/2020 01/13/2020 01/14/2020 01/14/2020	ce and filing issues stemming from Motion to Compel.	\$485.00	0.20	\$97.00
01/13/2020 01/13/2020 01/13/2020 01/13/2020 01/13/2020 01/14/2020 01/14/2020	Review client's suggested edits to motion to compel.	\$485.00	0.10	\$48.50
01/13/2020 01/13/2020 01/13/2020 01/13/2020 01/14/2020 01/14/2020	Conferences with I. Bucon re filing of Motion to Compel under seal and possible	\$485.00	0.20	\$97.00
01/13/2020 01/13/2020 01/13/2020 01/14/2020 01/14/2020	Electronic communications with [client] re [redacted] Motion to Compel.	\$485.00	0.10	\$48.50
01/13/2020 01/13/2020 01/13/2020 01/14/2020 01/14/2020	Teleconference with W. Lewis re edits to Declaration and filing of Motion to Compel and accompanying exhibits under seal.	\$485.00	0.20	\$97.00
01/13/2020 01/13/2020 01/14/2020 01/14/2020	Review and revise motion to compel discovery from plaintiff and supporting	\$395.00	1.50	\$592.50
01/13/2020 01/14/2020 01/14/2020 01/14/2020	Review and analyze plaintiff's document production [for: redacted] motion to compel and accompanying declaration.	\$395.00	1.00	\$395.00
01/14/2020 01/14/2020 01/14/2020	Evaluate scope of protective order [re: redacted] motion to compel discovery.	\$395.00	0.30	\$118.50
01/14/2020	luty to file redacted Motion to Compel.	\$485.00	0.10	\$48.50
01/14/2020	Follow-up with W. Lewis and I. Bucon re redaction of Motion to Compel and Exhibits.	\$485.00	0.20	\$97.00
	Review and analyze stipulated protective order to evaluate scope of necessary redactions for public motion to compel.	\$395.00	1.30	\$513.50
Bodney, D. 01/15/2020 Review, analyze and supplen compel and exhibits thereto	Review, analyze and supplement proposed redacted versions of motion to compel and exhibits thereto.	\$485.00	0.40	\$194.00
Bodney, D. 01/15/2020 Electronic communications	Electronic communications with client re [redacted] motion to compel.	\$485.00	0.10	\$48.50
Bucon,I.O. 01/15/2020 Review motion to compel a disclosure of information pr	Review motion to compel and evaluate redactions necessary to prevent disclosure of information protected by stipulated protective order.	\$395.00	2.50	\$987.50
Bodney, D. 01/16/2020 Electronic communication v	Electronic communication with [client] re [redacted] motion to compel.	\$485.00	0.10	\$48.50
Bodney, D. 02/03/2020 Review and analysis of Plair	Review and analysis of Plaintiff's Response to Motion to Compel	\$485.00	0.20	\$97.00
Bodney, D. 02/04/2020 Electronic communications compel	Electronic communications with L. Prather re: reply in support of motion to compel	\$485.00	0.20	\$97.00

	Date	Description	Rate	Hours	Amount
Bucon,I.O.	02/04/2020	Review and evaluate Plaintiff's Response to Defendants' Motion to Compel Discovery	\$395.00	0.50	\$197.50
Bodney, D.	02/06/2020	Review client e-mail re: [redacted] reply in support of motion to compel	\$485.00	0.20	\$97.00
Bucon,I.O.	02/06/2020	E-mail correspondence from [client] re: reply in support of motion to compel discovery from plaintiff	\$395.00	0.10	\$39.50
Bodney, D.	02/07/2020	Electronic communications with client and defense team re: reply in support of motion to compel	\$485.00	0:30	\$145.50
Bucon,I.O.	02/07/2020	Review and evaluate reply in support of motion to compel discovery from plaintiff [redacted]	\$395.00	0.80	\$316.00
Bodney, D.	02/08/2020	Conference with W. Lewis and I. Bucon re: Reply in Support of Motion to Compel	\$485.00	0.40	\$194.00
Bodney, D.	02/10/2020	Electronic communications with defense team re: [redacted] Motion to Compel	\$485.00	0.10	\$48.50
Bodney,D.	02/10/2020	Review and revise outline of Reply in Support of Motion to Compel	\$485.00	0.50	\$242.50
Bodney,D.	02/12/2020	Review and revise Reply in Support of Motion to Compel Discovery Pursuant to Fed. R. Civ. P. 37	\$485.00	1.50	\$727.50
Bodney, D.	02/12/2020	Electronic communications with L. Prather re: [redacted] Motion to Compel	\$485.00	0.20	\$97.00
Bucon,I.O.	02/12/2020	Review, evaluate and revise draft reply in support of motion to compel discovery	\$395.00	2.70	\$1,066.50
Bodney,D.	02/13/2020	Teleconference with [client] re: Reply in Support of Motion to Compel	\$485.00	0.20	\$97.00
Bodney, D.	02/13/2020	Electronic communications with client re: Reply in Support of Motion to Compel [redacted]	\$485.00	0.20	\$97.00
Bodney, D.	02/13/2020	Review and revise Reply in Support of Motion to Compel Discovery, including review of proposed exhibits, Plaintiff's Response and exhibits to original Motion	\$485.00	2.90	\$1,406.50
Bucon, I.O.	02/13/2020	Review and revise reply in support of defendants' motion to compel discovery from plaintiff	\$395.00	2.50	\$987.50
Bodney, D.	02/14/2020	Electronic communications with clients re: draft Reply in Support of Motion to Compel Discovery	\$485.00	0.20	\$97.00
Bodney,D.	02/14/2020	Review and analysis of proposed exhibits to Reply in Support of Motion to	\$485.00	0.20	\$97.00
Bodney,D.	02/14/2020	Review [redacted] Reply in Support of Motion to Compel	\$485.00	0.30	\$145.50
Bodney,D.	02/14/2020	Review and revise draft Reply in Support of Motion to Compel	\$485.00	0.70	\$339.50
Bucon,I.O.	02/14/2020	Review, evaluate and proof citations to record and exhibits in draft Reply in support of Motion to Compel	\$395.00	1.50	\$592.50

Name	Date	Description	Rate	Hours	Amount
Bucon,I.O.	02/14/2020	Confer with D. Bodney and W. Lewis re: [redacted] Reply in support of Defendants' Motion to Compel Discovery	\$395.00	0.20	\$79.00
Bodney, D.	02/15/2020	Review and revise draft Declaration in Support of Reply in Support of Motion to Compel Discovery Pursuant to Fed. R. Civ. P 37	\$485.00	0.70	\$339.50
Bodney, D.	02/15/2020	Electronic communications with W. Lewis re: edits to [redacted] Reply in Support of Motion to Compel Discovery	\$485.00	0.30	\$145.50
Bodney, D.	02/15/2020		\$485.00	0.20	\$97.00
Bucon, I.O.	02/16/2020	Review and revise draft Reply in support of Defendants' Motion to Compel Discovery to reflect [redacted] re: same	\$395.00	1.00	\$395.00
Bodney, D.	02/17/2020	Electronic Communications with defense team re: [redacted] Reply in Support of Motion to Compel	\$485.00	0.20	\$97.00
Bucon,I.O.	02/17/2020	Review, revise and proof Reply in support of Motion to Compel Discovery	\$395.00	1.70	\$671.50
Bucon,I.O.	02/17/2020	02/17/2020 Review and evaluate Reply in support of Motion to Compel Discovery and related Declaration of L. Prather [redacted].	\$395.00	0.50	\$197.50
Bucon,I.O.	02/17/2020	Review, cite-check and proof Declaration of L. Prather authenticating exhibits to Defendants' Reply in support of Motion to Compel Discovery	\$395.00	0.50	\$197.50
			Bodne	Bodney Subtotal	\$11,009.50
			Bucc	<b>Bucon Subtotal</b>	\$16,274.00
			6	Grand Total	\$27,283.50